

and a very large fat man, whose name she does not know, called on her at her home, and that Bass Rosser tried in every way possible to make her state that Mr. Frank had been familiar with her at the factory and that she had seen him acting in a familiar way with other girls at the factory; that the said Bass Rosser coaxed her, plead and even got mad with her because she would not swear to these things for him. Deponent further states each time that he called on her, she always stated that she had always found Mr. Frank to be a perfect gentleman and never knew him to commit any of the acts which Mr. Rosser was trying to make her swear that she had seen and heard.

Deponent makes this affidavit of her own free will and accord without any promises of reward whatsoever.

(Signed) Lillie Pettis

Sworn to and subscribed before me  
this 20th day of October, 1913,  
C.W. Burke,  
Notary Public, Fulton County, Ga."

(Exhibit B is an exact copy of the above affidavit, except that it is entitled in the case, is signed before J.O. Knight and has the following stricken: "Deponent also says that she is a sister-in-law of Nellie Pettis, who she says has stated that Mr. Frank on one occasion while she was at the factory, winked at her and asked her the question "How about it?" Deponent says that she does not believe her sister in law, Nellie Pettis is telling the truth when she makes this statement; that she does not believe Mr. Frank ever winked at Nellie Pettis or made any of the remarks referred to by her." )

Exhibit B.

Georgia, Fulton County:

Personally appeared Mrs. Lillie Mae Pettis of No. 43 Gairard Street, Atlanta, Fulton County, Georgia, who, upon oath deposes and says that on three occasions while she was employed at the National Pencil factory, in this city, and for various reasons, she sent her sister-in-law Miss Nellie Pettis, to the Pencil factory for her pay, each occasion on which she went her sister-in-law, Miss Pettis, to the factory being Saturday, which was the regular factory pay-day.

Deponent says that on each occasion she sent Miss Pettis to the factory for her pay, she gave Miss Pettis a written order for her salary, addressed to Miss Eula May Flowers, deponent's fore-lady.

Deponent further says that, on each occasion when she sent Miss Nellie to the factory for her pay, deponent's place of residence was then at the home of Miss Nellie Pettis and her mother, which was No. 9 Oliver Street, in this city.

Deponent also says that when Miss Nellie delivered her salary on the first two occasions that deponent had sent her after same, deponent asked Miss Nellie what Miss Flowers had said to her with reference to deponent and her absence from the factory, and that Miss Nellie replied that Miss Flowers had not said anything whatever regarding deponent, but that Miss Flowers simply handed her deponent's money without remarks.

Deponent also says that on the third occasion when Miss Nellie went to the factory for deponent's pay, she accompanied Miss Nellie as far as Forsyth and Hunter Streets and waited there while Miss Nellie went in the factory after deponent's pay; and deponent says that Miss Nellie was not in the factory exceeding five minutes. Deponent says that as soon as Miss Nellie got out of the factory with deponent's pay, she asked her if Miss Flowers had asked her any questions regarding deponent, and Miss Nellie again replied that Miss Flowers did not ask her any questions, but had gone into the office, secured deponent's pay, and handed it to her.

Deponent says that Miss Nellie never said anything to her about meeting, or seeing, Mr. Frank, on any of the occasions she had been sent to the factory, and deponent further says that Miss Nellie was never at the factory but four times, three of these times being described in the above statement. The fourth occasion was more than a year ago, when Miss Nellie accompanied deponent to the factory for the purpose of seeking a position in the factory under Miss Eula Mae Flowers; that Miss Nellie asked Miss Flowers for a position, and that the application for this position took place at about 7:10 a.m., and before Mr. Frank had come to the factory, deponent being familiar with the fact that Mr. Frank did not